

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>AARON PATTERSON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 03 C 4433</b>
<b>vs.</b>	)	
	)	<b>Judge Gottschall</b>
<b>Former Chicago Police Lt. JON BURGE, et. al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO ADJUDICATE ATTORNEYS' LIEN**

Now come People's Law Office and Stan Willis, former counsel for plaintiff Aaron Patterson, and move that this Court adjudicate their attorneys' lien; determine the entitlement of all of plaintiff's attorneys, past and present, to attorneys' fees and costs in this case; set a reasonable total fee due to all counsel; set a schedule for filing supporting documents, and in support of this motion state:

1. People's Law Office and Stan Willis previously represented plaintiff Aaron Patterson in this litigation and have an attorneys' lien on this law suit and its proceeds.

2. People's Law Office and Stan Willis have an entitlement to attorneys' fees and costs for their representation of plaintiff, and this entitlement will affect the rights of all of plaintiffs' attorneys to attorneys' fees and costs, and the apportionment and distribution of any settlement that may be obtained by the plaintiff.

3. Plaintiff has now entered into an agreement to settle the underlying case, and this settlement has been approved by the Finance Committee of the Chicago City Council, and is expected to be approved at the full Chicago City Council meeting on December 12, 2007.

4. Undersigned counsel intend to file materials supporting their entitlement to attorneys' fees and on the issues of the appropriate fee for plaintiff's current counsel and the reasonable total fee which should be paid by plaintiff to his attorneys past and present. These materials will include the history of People's Law Office's 12-year representation of plaintiff, the work which undersigned counsel did on his case prior to their withdrawal, the costs which they incurred, the circumstances under which they withdrew from plaintiff's case and the work done subsequent to undersigned counsel's withdrawal which further directly benefitted plaintiff in his litigation and settlement.

Wherefore, undersigned counsel request that this court adjudicate their attorneys' lien; determine the entitlement of all of plaintiff's attorneys, past and present, to attorneys' fees and costs in this case; set a reasonable total fee due to all counsel, and set a schedule for filing supporting documents.

Dated: December 10, 2007

Respectfully Submitted,

/s/ G. Flint Taylor  
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Michael E. Deutsch, Ben Elson  
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